



DOCKET FILE COPY ORIGINAL

STATE OF WASHINGTON

WASHINGTON STATE PATROL

2803 - 156th Ave. S.E. • Bellevue, Washington 98007-6599 • (425) 649-4654 • FAX (425) 957-2364

July 2, 1998

Magalie Salas, Secretary
Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

Dear Ms. Salas:

The Washington State Patrol respectfully requests that the attached late filed comments be accepted for consideration in the matter of RM-9274, "Petition of the National Public Safety Telecommunications Council for Further Rulemaking to Allocate Spectrum in the 138-144 MHz Band for Public Safety".

If you have any questions regarding this matter, please contact Mr. Ross Morris, Commander, Electronic Services Division at (425) 649-4666.

Thank you for your consideration in this matter.

Sincerely,

CHIEF ANNETTE SANDBERG

Mr. Ross A. Morris
Commander
Electronic Services Division

RAM: bn
Enclosures

No. of Copies rec'd 0+8
List A B C D E WT



Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)

The Petition of the National)
Public Safety Telecommunications)
Council For Further Rulemaking)
To Allocate Spectrum In The)
138 -144 MHz Band For Public)
Safety)

RM 92-74

To: The Commission

COMMENTS OF

The Washington State Patrol

The Washington State Patrol (Patrol) is the major statewide law enforcement agency for the State of Washington. The Patrol employs about 2000 persons. It is responsible for all phases of law enforcement including, but not limited to, traffic, crimes on state property, dignitary protection, the state Crime Labs, Criminal Records and drug enforcement assistance. In addition the Patrol supplies communications services to all other state law enforcement agencies.

The State of Washington is the 18th largest state in the United States. It has a population of 5 million with over half living in the Puget Sound region. It consists of 71,303 Sq. miles ranging in elevation from sea level to 14,411 feet.

The Patrol operates on High Band VHF and uses simplex remote transmitters controlled by a large microwave system. Although the system uses about 20 VHF frequencies the reuse of most of these frequencies are limited by Canada to the north and Oregon to the south.

COMMENTS

The Patrol is satisfied with the operational characteristics of VHF High Band but has long had a problem with insufficient spectrum to properly carry out its mission. One major concern is a desire to move to duplex operation which has not been an option to the Patrol due to the limited spectrum. A second concern is the lack of additional channels to reduce excessive channel loading. A third concern is the present opening of all frequencies to all public safety. It is now a constant effort to track and correct

interference from non police users. This is becoming an important public safety issue. Other public safety agencies can suffer much high levels of interference than police operations.

The Patrol has seriously looked at moving to the higher bands that may become available but to implement these on a statewide bases to duplicate the coverage obtained by the present VHF system would be cost prohibitive in country such as the State of Washington. The cost and time to develop the additional sites needed would be impossible for the Patrol to accomplish.

The Patrol is at a critical juncture. It does not have the funding to go to a higher band requiring many more sites to be developed. It must stay with VHF High Band but it must have spectrum relief. This can only come from the 138 – 144 MHz band.

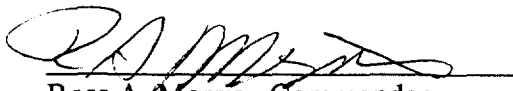
RECOMMENDATIONS

The Patrol supports the NPSTC petition to allocate 3 MHz in the 138 – 144 MHz band to Public Safety. The Patrol recommends the frequencies be configured in channel pairs to allow duplex operation and mobile relay systems. Finally the Patrol recommends at least 30 pairs be restricted for statewide Police operations only.

CONCLUSIONS

The Patrol strongly urges the Commission to adopt the above recommendations and thereby provide the critical relief needed by most State Police operations. The Patrol thanks the Commission for this opportunity to comment on this most critical issue.

Respectfully submitted
Washington State Patrol
2803 156th Ave SE
Bellevue, WA. 98007


Ross A. Morris, Commander
Electronic Services Division

Date 6/30/98